

Export Requirements of EPA's Cathode Ray Tube Rule

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- Post questions using the chat box under the participant box on the top of the screen.
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- This call is being recorded and will be available for playback at a future date.

Export Requirements of EPA's Cathode Ray Tube (CRT) Rule

- also known as the “CRT Rule”

CRT RULE

➤ Final rule issued, July 2006

» <http://www.epa.gov/epawaste/hazard/recycling/electron/index.htm#crt>

» The complete rule is found at 40 CFR Part 261.39 - 41

➤ Intended to streamline requirements and encourage recycling.

➤ The rule is a conditional exclusion

» If conditions are met, CRTs can be handled as non-waste

➤ Non-compliance may constitute a violation of Resource Conservation and Recovery Act (RCRA) hazardous waste requirements.

➤ The rule does not change RCRA requirements for disposal of CRTs

CRT RULE EFFECTIVE DATES

➤ **Domestic requirements go into effect if adopted by the states**

» **Some states have adopted the rule**

➤ **Export requirements went into effect January 29, 2007**



Definitions

- *Cathode ray tube or CRT:* means a vacuum tube, composed primarily of glass, which is the visual or video display component of an electronic device.
- *A used, intact CRT:* means a CRT whose vacuum has not been released.
- *A used, broken CRT:* means glass removed from its housing or casing whose vacuum has been released.
- *CRT collector:* means a person who receives used, intact CRTs for recycling, repair, resale, or donation.

Definitions

- *CRT processing* means conducting all of the following activities:
 - » Receiving broken or intact CRTs; and
 - » Intentionally breaking intact CRTs or further breaking or separating broken CRTs; and
 - » Sorting or otherwise managing glass removed from CRT monitors.
- *Recycling*: consists of disassembly to recover valuable materials from the CRTs, such as lead or glass.
- *Reuse*: The CRT remains intact, and is able to be used as a display device. The CRT, or the device that it is in, may or may not need repair.

CRT RULE

Processed Glass

➤ Processed glass:

- » Not regulated if destined for CRT glass manufacturer or lead smelter
- » If destined for other types of recycling, may be excluded on a case-by-case basis
- » No speculative accumulation
- » No notification is needed for the export of *processed* glass

Domestic Management Requirements

(Summarized)

- CRTs must be stored in a building or container that minimizes release of CRT glass to the environment.
- Each container must be properly labeled.
- CRTs must be transported in a container meeting the above requirements.
- CRTs may not be speculatively accumulated.
- See 40 CFR Part 261.39 – 41 (<http://edocket.access.gpo.gov/cfr/2008/julqtr/pdf/40cfr261.39.pdf>) for exact requirements.
- Check with your state environmental agency to learn if they have adopted this rule.



CRT RULE EXPORT REQUIREMENTS

➤ Two types of notifications

1. **Export for recycling**
 - International notification & consent
 - Notify EPA HQ
2. **Export for reuse/refurbishment**
 - One-time notification to EPA only
 - Notify EPA Region



CRT RULE EXPORT FOR RECYCLING

CRTs & unprocessed CRT glass

- » Exporter must send notification to EPA HQ 60 days prior to export.
- » Notification should include:
 - Names and addresses of exporter, recycler, and any alternate recycler
 - Exporter EPA ID number (if applicable)
 - Amount (pounds) of material, and rate of export, during the next 12 months
 - Notification may cover export over a 12 month or lesser period
 - Points of entry and departure of all countries the CRT will pass through
 - Shipping means and container type
 - How the CRTs will be recycled
 - The name of any transit countries through which the CRTs will be sent and a description of the approximate length of time the CRTs will remain in such country and the nature of their handling while there.
- » Observe same packaging & labeling requirements applicable to domestic shipment.
- » No speculative accumulation.

CRT RULE

EXPORT FOR RECYCLING

- » Once EPA receives the notice:
 - EPA forwards the notification to transit & importing countries
 - EPA notifies exporter of consent or denial by receiving countries
 - Export *cannot* proceed without consent of receiving countries
- » Recycling notifications go to:
 - Office of Enforcement and Compliance Assurance
 - See 40 CFR 261.39 for mailing addresses
- » Retain copies of notifications and Acknowledgement of Consent to Export CRTs for three years after the receipt of the Acknowledgement.

CRT RULE

EXPORT FOR REUSE/REFURBISHMENT

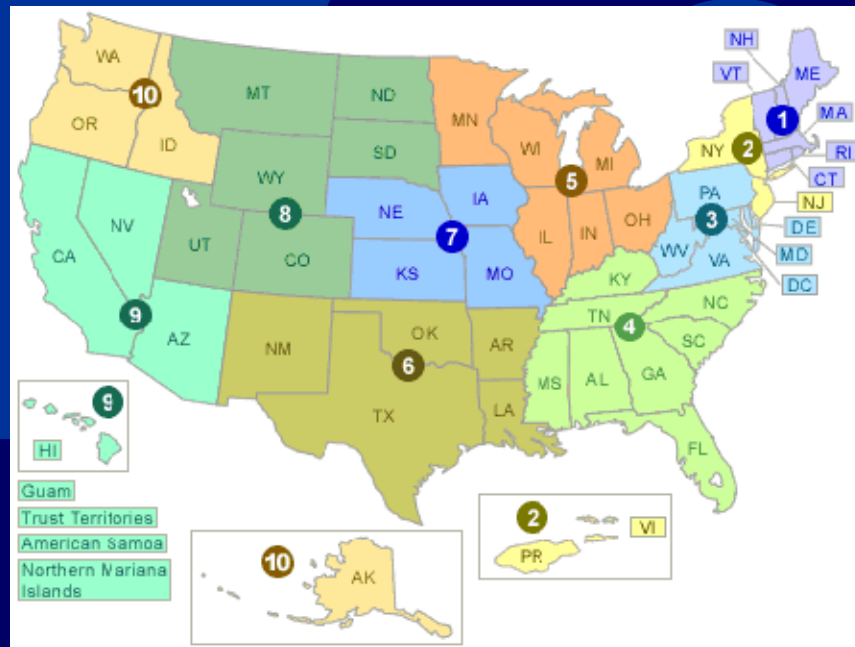
➤ Intact CRTs for Reuse or Refurbishment

- » Exporter must send a one-time notification to EPA Region.**
 - Notification must contain:**
 - Exporter's contact information**
 - Statement of intent to export**
- » Exporter must keep business records for 3 years demonstrating export for legitimate reuse/refurbishment.**
- » Shipment can proceed without acknowledgement of EPA.**

CRT RULE

EXPORT FOR REUSE/REFURBISHMENT

- Notification for reuse shipments are mailed to the local EPA Region from which the CRTs are exported.
- Notifications are mailed to the Regional Import/Export Coordinator, cc: the Regional Administrator.



For addresses see:

<http://www.epa.gov/osw/hazard/international/crts/regions.htm>

Notice List Links and Contact

➤ Companies Approved to Export CRTs for Recycling:

» <http://www.epa.gov/osw/hazard/international/crts/recycling.htm>

➤ Companies submitting to Export CRTs for Reuse:

» <http://www.epa.gov/osw/hazard/international/crts/reuse.htm>

➤ These links are updated periodically. Persons needing immediate information about notices should contact:

- » Jana Tatum, tatum.jana@epa.gov, (for recycling notices)
- » Regional Import-Export Coordinator (for reuse notices).

Other CRT Rule Links

Code of Federal Regulations link for CRT Rule:

http://edocket.access.gpo.gov/cfr_2008/julqtr/pdf/40cfr261.39.pdf

CRT Rule Web Page

<http://www.epa.gov/osw/hazard/recycling/electron/index.htm>

CRT Rule Final Rule:

<http://www.epa.gov/fedrgstr/EPA-WASTE/2006/July/Day-28/f6490.htm>

CRT RULE ENFORCEMENT

➤ Incentive for
downstream due
diligence:

» All persons* in
management chain
can be held liable for
downstream violation

* Those involved from point
at which decision was
made to recycle



Compliance Suggestions

➤ Do your due diligence

- » Voluntary tools such as the:

- » Responsible Recyclers Guidelines:

<http://www.epa.gov/waste/conserve/materials/ecycling/r2practices.htm>

- » Federal Electronics Challenge Audit tools can help, especially for non-CRT e-waste:

<http://www.federalelectronicschallenge.net/resources/eolmngt.htm#three>

➤ If possible, obtain copies of export notices and Acknowledgments of Consent filed with EPA

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